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Attorneys for Plaintiff Babak Pishvae

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BABAK PISHVAEE, individually, and on)
behalf of a class of similarly situated)
individuals,)
)
Plaintiff,)
)
v.)
)
VERISIGN, INC., a California corporation,)
and M-QUBE, INC., a Delaware corporation.)
)
Defendants.)

Case No. C-07-3407 PVT

**STIPULATION RE: FIRST AMENDED
COMPLAINT AND DEFENDANTS'
TIME TO RESPOND TO FIRST
AMENDED COMPLAINT**

1 Defendants VeriSign, Inc. and m-Qube, Inc. (collectively "Defendants") and plaintiff Babak
2 Pishvaei ("Plaintiff"), through their respective counsel of record, pursuant to Local Rule 6-1(a),
3 hereby stipulate and agree as follows:

4 WHEREAS, on June 28, 2007, Plaintiff served Defendants with its original complaint in this
5 action;

6 WHEREAS, the time for Defendants to respond to the original complaint was August 30,
7 2007, per stipulation of the parties;

8 WHEREAS, on August 24, 2007, counsel for Plaintiff, William Audet, and counsel for
9 Defendants, James Cooper and Angel Tang, engaged in a telephonic meet and confer session in an
10 attempt to resolve the issues raised by Defendants' intended motions to dismiss. Following the
11 conference of counsel, the parties agreed as follows: (1) Defendants will not be required to respond
12 to the original complaint by August 30, 2007, as Plaintiff has agreed to amend the complaint;
13 (2) Plaintiff shall file a first amended complaint no later than September 21, 2007; and (3)
14 Defendants shall file their respective responsive pleadings to the first amended complaint no later
15 than November 20, 2007.

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1 NOW, THEREFORE, the parties stipulate and agree as follows:

- 2 1. Defendants VeriSign, Inc. and m-Qube, Inc will not be required to respond to the
3 original complaint by August 30, 2007, as Plaintiff has agreed to amend the complaint;
4 2. Plaintiff Babak Pishvaei shall file a first amended complaint no later than September
5 21, 2007; and
6 3. Defendants VeriSign, Inc. and m-Qube, Inc shall file their respective responsive
7 pleadings to the first amended complaint no later than November 20, 2007.

8
9 Dated: August 24, 2007

ARNOLD & PORTER LLP

10
11 By: /S/
ANGEL L. TANG
12 Attorneys for Defendants
VeriSign, Inc. and m-Qube, Inc.

13 Dated: August 24, 2007

AUDET & PARTNERS, LLP

14
15
16 By: /S/
WILLIAM M. AUDET
17 Attorneys for Plaintiff Babak Pishvaei

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